

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:

PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

(Jointly Administered)

Re: Docket # 20789

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**CONSTRUCTORA SANTIAGO II, CORP. RESPONSE TO THE FIVE HUNDRED
SEVENTY-SEVEN OMNIBUS (577) OBJECTION (SUBSTANTIVE) OF THE
COMMONWEALTH OF PUERTO RICO, THE EMPLOYEES' RETIREMENT
SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO
AND THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY
TO CLAIMS FOR WHICH THE DEBTOR IS NOT LIABLE**

TO THE HONORABLE JUDGE LAURA TAYLOR SWAIN:

COME NOW CONSTRUCTORA SANTIAGO II, CORP. ("CSC") represented by the
undersigned attorney and respectfully sets forth and prays:

¹ The Debtors in these Title III Cases, along with each Debtor's respective title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. That on April 20,2023, the Commonwealth of Puerto Rico (the “Commonwealth”) and the Puerto Rico Highways and Transportation Authority (“HTA”) filed the Five Hundred Seventy-Seven (577) Omnibus Objection (substantive) [docket no. 24053] to the claims listed in Exhibit A (docket no. 24053-1).

2. That CSC’s claim number 15869 in the amount of \$4,435,566.81 was listed in Exhibit A – Claims to be Disallowed of the Five Hundred Seventy-Seven of the Omnibus Objection to Claims.

3. That CSC after a careful review of the account receivable ledger and legal documents on file, admits the allegations depicted by movant in the Five Hundred Seventy-Seven Omnibus (Substantive) Objection to claim number 15869 and consents to the entry of an order disallowing claim number 15869, because said claim was settled and paid after it was filed.

WHEREFORE CSC hereby consents to the entry of an order disallowing claim number 15869, because said claim was settled and paid after it was filed.

In San Juan, PR, this 17th day of May 2023.

CERTIFICATE OF ELECTRONIC FILING AND SERVICE

I hereby certify that on even date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: to all attorneys that have filed their respective notice of appearance and to the Standard Parties as such term is defined in the Court’s Order Establishing Case Management Procedures, supra:

- (i) Chambers of the Honorable Laura Taylor Swain (two copies shall be delivered to each chambers listed below):

United States District Court for the District of Puerto Rico
150 Carlos Chardón Street,
Federal Building, Office 150,
San Juan, P.R. 00918-1767

-and-

United States District Court for the Southern District of New York

Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Suite No. 3212
New York, New York 10007-1312

- (ii) Office of the United States Trustee for Region 21
Edificio Ochoa, 500 Tanca Street, Suite 301
San Juan, PR 00901-1922

- (iii) Puerto Rico Fiscal Agency and Financial Advisory Authority (AAFAF):

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And I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: to the members of the Creditors' Committee at their postal address of record.

In San Juan, Puerto Rico, this 17th day of May, 2023.

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